

CONTINUATION OF CRIMINAL COMPLAINT

I. INTRODUCTION

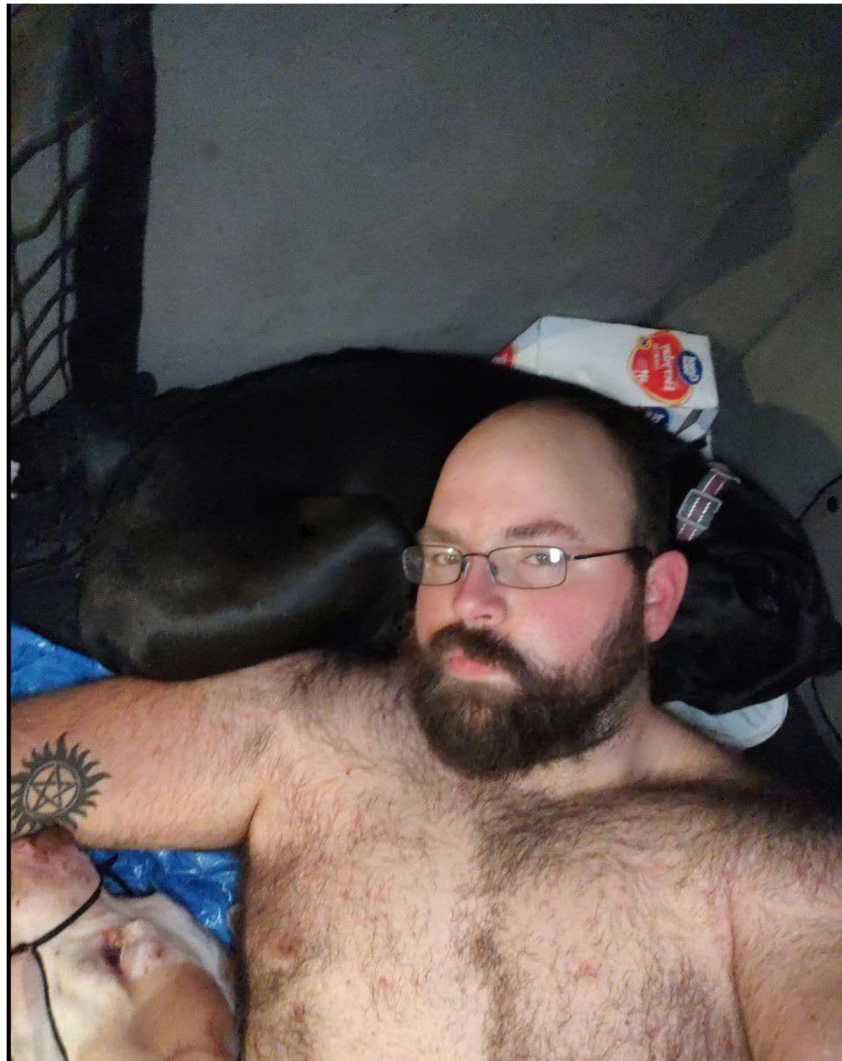
1. I, Timothy Kruithoff, have been employed as a Special Agent with the Department of Homeland Security Investigations (HSI) since August 2002. Prior to becoming a Special Agent, I was employed as U.S. Customs Inspector. As part of my duties as an HSI Special Agent, I investigate criminal violations relating to child exploitation and child pornography including violations pertaining to the sexual exploitation of children (i.e., production of child pornography), in violation of 18 U.S.C. § 2251(a) and violations pertaining to the illegal distribution, receipt, and possession of child pornography, in violation of 18 U.S.C. § 2252A. I have received training in the investigation of the production, distribution, and possession of child pornography and child exploitation; how the internet and digital devices are used to commit such offenses; and the examination of digital devices and the interpretation of digital evidence. My training and experience have application in the investigation of other paraphilia and sexual misconduct.
2. The statements in this Continuation of Application for a Criminal Complaint and Arrest Warrant are based in part on information from HSI agents, the Northern Territory Police Force (Australia), criminal research analysts, and my investigation of this matter. This Continuation of Application for a Criminal Complaint and Arrest Warrant is intended to merely show there is probable cause for the requested warrant and does not set forth each and every fact known to me concerning this investigation.
3. The information in this Continuation establishes probable cause that **Lucas Russell VANWOERT** (Date of Birth: XX/XX/1997), created and distributed animal crush videos in violation of Title 18, United States Code, Section 48 and produced and distributed obscene material in violation of Title 18, United States Code, Section 1465.

II. FACTS SUPPORTING PROBABLE CAUSE

4. On April 22, 2022, the Northern Territory Police (NTPOL) Joint Anti-Child Exploitation Team (JACET) and HSI Canberra executed a search warrant at a residence in McMinns Lagoon, Northern Territory, Australia to identify the individual responsible for creating an animal cruelty video titled “1Bitch9Pups” which circulated on Chat Application A¹ and elsewhere on the Internet. NTPOL subsequently arrested and charged a 51-year-old male (hereinafter referred to as “the POI”) for multiple offenses including bestiality, animal cruelty, aggravated animal cruelty, and child exploitation crimes. In addition to the files of animal abuse, multiple image, and video files of suspected child exploitation material (CEM) were found on the POI’s devices. The POI was found to operate two (2) Chat Application A accounts and was known in topic specific Chat Application A groups as a high-level producer of animal cruelty videos.

¹ The true name of “Chat Application A” is known to me. Because of ongoing investigations, I am not revealing the name in this continuation.

5. During an analysis of electronic devices seized from the POI, law enforcement located multiple image and video files of animal cruelty produced beginning in November 2020, by an unknown individual using the nickname “**Graves**.” It was determined that the POI and “**Graves**” exchanged approximately 705 files of animal abuse with one another.
6. An initial review of the material produced by “**Graves**” indicated that the material was filmed in the sleeper cabin of a tractor trailer and involved at least four (4) different dogs that were sexually abused and tortured. In some of these files an adult male’s face is visible as is a unique tattoo of a star surrounded by sunrays on his arm. Below is an image that was uncovered by law enforcement from the POI’s electronic devices that includes the full view on an adult male’s face and the tattoo. This image also includes what appears to be a tan and white pit bull with its mouth tied shut:



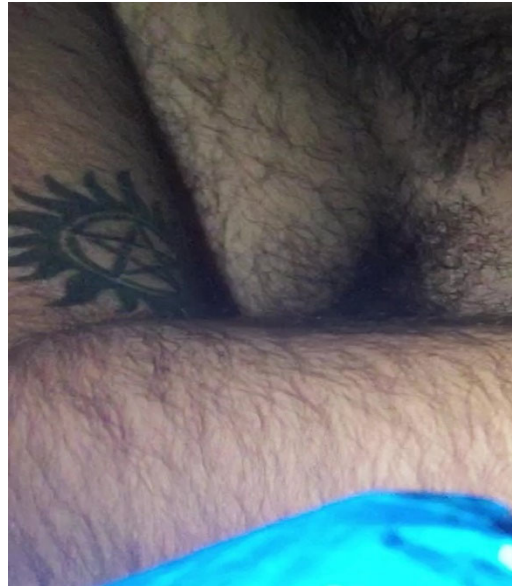
7. These files containing multiple image and video files of animal cruelty produced beginning in November 2020 by “Graves”, were located on at least four (4) separate electronic devices that were seized from the POI. Law Enforcement was able to extract EXIF data from some of the files associated with “Graves” which included GPS location data that showed they were created at a truck stop in Michigan on November 16, 2020. A Chat Application A conversation between the POI and “Graves” was also located on the POI’s device in which “Graves” sent an image of a tractor trailer with a partial Tennessee license plate number. NTPOL provided their evidence to HSI Canberra for further investigation.
8. Based on the initial information provided by NTPOL, HSI agents and analysts were able to identify “Graves” as **Lucas Russell VANWOERT** (DOB: XX/XX/1997; SSN: XXX-XX-0226). Law Enforcement began checking databases for ownership information related to the tractor trailer license plate mentioned above. Utilizing public records databases, **VANWOERT** was found to be associated with addresses in Michigan, Ohio, and Tennessee, through current and former driver’s licenses and the following vehicles: 2009 Harley Davidson (TN plate # 390ZV6); 2016 Ford Fusion (TN plate # 484BFNQ); 2017 Jeep (MI plate # DPB0375).
9. A review of **VANWOERT’s** Ohio and Michigan driver’s license photos, as well as the individual in the “Graves” videos. It is believed that **VANWOERT** and “Graves” have the same hair line, eyes, facial structure, style beard, and style glasses.

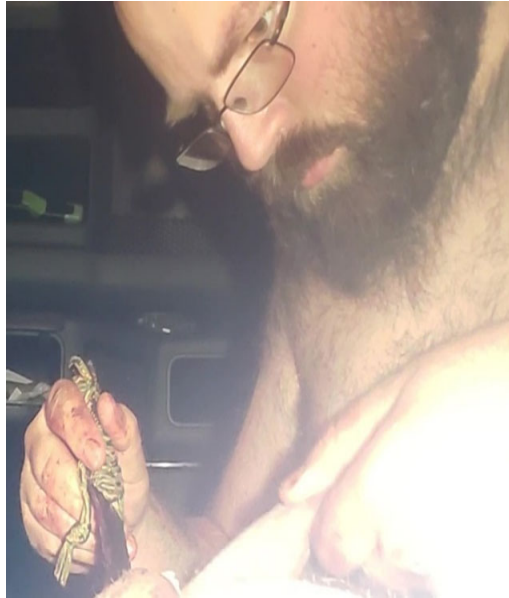


10. A review of social media accounts associated with **VANWOERT** in which he identified himself as a “Former Class A Truck Driver at Patty Construction.” Other social media accounts associated with **VANWOERT** show pictures of him in the cab of tractor trailers.
11. According to **VANWOERT’s** Facebook profile, he is married to Heather VanWoert. It was observed that the profile picture associated with TikTok user “@lucasvanwoert” matches the driver’s license photo of **VANWOERT** and the individual has the same tattoo that was observed in the files associated with “Graves”.

12. I reviewed four (4) video files associated with the “**Graves**” profile that were found on the POI’s electronic devices and all appear to include **VANWOERT**. These video files have creation dates between November 8, 2020, and November 16, 2020. All video files appear to include the same adult male and male Pitbull who is brown and white in color. The adult male’s face and/or tattoo are visible in some of these files and match the individual pictured above. It appears to be **VANWOERT** based on his body hair and structure, as well as items that appear in the background of the videos. These four (4) video files can be further described as:

- A. File “144 20201116_020629” (Media Created 11/16/2020 at 2:09 AM) – this 3 minute 18 second video file includes the full view of an adult male’s face, and it matches **VANWOERT’S** driver’s license and social media pictures. The dog is not moving in this video and appears to be deceased. During the video **VANWOERT** uses a hunting knife to cut out and remove the dog’s tongue. **VANWOERT** then holds up the tongue and shakes it in front of the camera. Before the video ends, **VANWOERT** opens the mouth of the dog and shows a close-up of the inside of its mouth with the tongue removed. Below are two screen captures from this video which show **VANWOERT’S** face, and the tattoo described/pictured above.





B. File “50 20201116_002421” (Media Created 11/16/2020 at 12:26 AM) – this 2 minute 16 second video file depicts what appears to be the same adult male and the unique tattoo associated with VANWOERT as described above is visible. The dog is lying on its back with its rear legs secured up in the air by silver duct tape and red straps. The dog is still moving and can be heard breathing. The dog’s anus and testicles are both covered in blood and the adult male can be observed thrusting a large hunting knife in and out of the dog’s anus. The hunting knife in this video appears to match the one used by VANWOERT to remove the dog’s

tongues as shown in the image above. This video appears to be made using a fixed camera and throughout the video the adult male can be observed taking close-up pictures with a cellphone.

- C. File “604 20201116_005923” (Media Created 11/16/2020 at 1:05 AM) – this 6 minute 15 second video file depicts an adult male cutting the dog’s testicles open with a hunting knife and pulling them both out with a pair of pliers. The dog is still moving while this occurs, and you can hear its labored breathing. This video appears to be made using a fixed camera and throughout the video the adult male can be observed taking close-up pictures and videos with a cellphone. The adult male’s face is not visible in this video, but the body hair and structure match that of VANWOERT. In addition, the hunting knife matches the one VANWOERT was holding as pictured above. Throughout the video the adult male can be observed taking pictures and videos with his cellphone. It is not possible to see the applications that the adult male is entering on his cellphone, but in between taking the videos and images with his cellphone, the male occasionally exits to his home screen and clicks on an application before resuming.
- D. File “496 20201115_232003” (Media Created 11/15/2020 at 11:21 PM) – approximately 37 seconds into this video file, you can observe an adult male holding a cellphone and the home screen reads “T-Mobile, 23:20, and Sun, Nov 15.” Also on the home screen, you can see a message from “Monster” on Chat Application A. “Monster” is one of the Chat Application A accounts associated with the POI. The adult male’s face is not visible in this video, but the body hair and structure match that of VANWOERT. In addition, the hunting knife matches the one VANWOERT was holding as pictured above.

13. Law Enforcement discovered in EXIF data that the above four (4) files that “**Graves**” created contained GPS location data and were filmed in the Western District of Michigan. Law Enforcement database checks indicated that during this time period **VANWOERT** was residing within the Western District of Michigan as well.
14. The exact date that the videos were sent to POI is not known to me. The NTPOL would have that information, but I was unable to reach them today. **VANWOERT** moved to Ohio approximately three months ago. The NTPOL investigation, seizure, and search of POI’s devices pre-date **VANWOERT’s** move from Michigan to Ohio. I believe there is probable cause that **VANWOERT** distributed the videos to POI while he still lived in Grand Rapids.
15. On September 27, 2022, HSI agents executed a federal search warrant on **VANWOERT’s** home in Ohio. I have been advised of the following. Agents seized and are conducting searches of digital devices. The preliminary examination has disclosed an additional animal crushing video. **VANWOERT** was not arrested, advised he was free to leave, and he agreed to answer questions. **VANWOERT** admitted to engaging in sex acts, beating, and strangling a dog in the yard of Sunset Logistics (**VANWOERT’s** former employer) in Grand Rapids and placing the body in a dumpster. He could not give a specific date for this event. Agents found three live dogs at the residence and discovered the body of a fourth dog buried in the back yard. The three dogs appear to be malnourished and in very poor health.

III. STATUTORY AUTHORITY

16. As noted above, this investigation concerns alleged violations of the following:

Title 18, United States Code, Section 48 provides, in part, the following:

- (a) Offenses.—
 - (1) Crushing.—

It shall be unlawful for any person to purposely engage in animal crushing in or affecting interstate or foreign commerce or within the special maritime and territorial jurisdiction of the United States.
 - (2) Creation of animal crush videos.—

It shall be unlawful for any person to knowingly create an animal crush video, if—

 - (A) the person intends or has reason to know that the animal crush video will be distributed in, or using a means or facility of, interstate or foreign commerce; or
 - (B) the animal crush video is distributed in, or using a means or facility of, interstate or foreign commerce.
 - (3) Distribution of animal crush videos.—

It shall be unlawful for any person to knowingly sell, market, advertise, exchange, or distribute an animal crush video in, or using a means or facility of, interstate or foreign commerce.

(c) Penalties.—

Whoever violates this section shall be fined under this title, imprisoned for not more than 7 years, or both.

(f) Definitions.—In this section—

(1) the term “animal crushing” means actual conduct in which one or more living non-human mammals, birds, reptiles, or amphibians is purposely crushed, burned, drowned, suffocated, impaled, or otherwise subjected to serious bodily injury (as defined in section 1365 and including conduct that, if committed against a person and in the special maritime and territorial jurisdiction of the United States, would violate section 2241 or 2242);

(2) the term “animal crush video” means any photograph, motion-picture film, video or digital recording, or electronic image that—

(A) depicts animal crushing; and

(B) is obscene;

Title 18, United States Code, Section 1465 provides, in part, the following:

Whoever knowingly produces with the intent to transport, distribute, or transmit in interstate or foreign commerce, or whoever knowingly transports or travels in, or uses a facility or means of, interstate or foreign commerce or an interactive computer service . . . in or affecting such commerce, for the purpose of sale or distribution of any obscene, lewd, lascivious, or filthy book, pamphlet, picture, film, paper, letter, writing, print, silhouette, drawing, figure, image, cast, phonograph recording, electrical transcription or other article capable of producing sound or any other matter of indecent or immoral character, shall be fined under this title or imprisoned not more than five years, or both.

IV. CONCLUSION

17. Based on the above information, there is probable cause to believe that **Lucas Russell VANWOERT** created and distributed animal crush videos in violation of Title 18, United States Code, Section 48 and produced and distributed obscene material in violation of Title 18, United States Code, Section 1465. Accordingly, I respectfully request that this Court authorize a criminal complaint and issue an arrest warrant for **VANWOERT**.